Basin states as they approach their 7.5 MAFY entitlement (see Table DD-5), global weather changes and possibly data technique errors from 1900 thru 1940, which may have overstated actual river flows (authors opinion not supported by documentation with regard to global weather changes and data techniques errors). Again, analyzing the data from Table DD-5, over the 1991 to 2000 time span, the average ten year annual flow expressed as the sum of the Upper and Lower Basin states and Mexico deliveries was 13,778 MAFY. This volume included draw downs of storage in Lake Powell and Lake Mead, thus if drought conditions remain, it cannot be supported. Unfortunately, the total entitlements for the Colorado River are 16.5 MAFY (7.5 MAFY Upper Basin, 7.5 MAFY Lower Basin and 1.5 MAFY Mexico), thus the flows of the Colorado River are over-allocated.

What this means is that banking of surplus Colorado River water flows today is MANDATORY, not an option. In the not too distant future, without a radical weather change toward long-term significantly enhanced rainfall over the Colorado River Basin, the river will not be able to supply the entitlement allocations of the combined Upper and Lower Basin states and Mexico.

A cautionary note: I have not had the opportunity, nor the time to fully review the FEIS-CRISC dated December 2000. As such, the above presented analysis may be in conflict with the FEIS-CRISC and the reader should exert due diligence in arriving at a conclusion. Further, it is my belief, that the preceding analysis represents a true picture of the situation and thus should be given full consideration when evaluating the criteria for alternative 10.

The paragraph beginning with "EXPLANATION: ..." needs to be modified and expanded.

- Criteria C1 should be rated UNKNOWN - short-term and FAIL - long-term. The analysis presented shows Colorado River surplus flows can provide and average 112 KAFY priority 5 entitlement to SDCWA plus another 38 KAFY priority 6 purchasable from IID/CVWD/PVID, thus meeting the minimum option of 130 KAFY of the Project, providing banking of surplus flows is available. Long-term, again per the analysis, surplus water will not be available, thus the long-term FAIL
- The impact to IID's water rights and the QSA have been discussed previously in alternatives 7, 8 and 9. The discussion is repeated herewith IID can find other ways to protect its water rights without the proposed Project. A number of examples, not intended to be all inclusive, come to mind. 1) Implement the QSA, implement in district water conservation programs per the proposed Project, and expand acres farmed to utilize a portion of the water conserved, and utilize the remainder of the conserved water to support the SSRA's effort to stabilize (save) the Salton Sea. 2) Implement the QSA and instigate a water transfer deal with Mexico to increase Mexican farming operations in exchange for payments to support district water conservation efforts. Water exported to Mexican farming operations must be structured to have a return flow to the Salton Sea via the New or Alamo Rivers. Implementation of the QSA, independent of the IID/SDCWA water transfer would place IID partially in compliance with SWRCB directives and should be viewable as a positive step toward implementation of the 4.4 Plan. Given any progress toward reducing California's take from the Colorado River, I seriously doubt that the Secretary of Interior will drastically cut California's take as of January 2003. However, as shown in Table DD- 6: Lower Colorado Water Supply Report (source: www.lc.usbr.gov), it is of concern that the LCR water storage facilities are only at 73% of capacity, meaning another 10.845 MAF can be stored. Thus the Secretary has the room to declare no excess flows for the LCR and restrict California to 4.4 MAF. Politically, I doubt that it can be done. Based on the potential for alternatives for IID, criteria C2 should be marked MAYBE, not FAIL. Likewise, criteria C7 should be marked MAYBE, not UNKNOWN.

CONCLUSION: After re-evaluation, the screening criteria for **Alternative 10** exhibit NO short-term FAILS, and because storage of current surplus flows of the Colorado River is viewed as a MANDATORY water conservation project, this alternative should be further evaluated. Additionally, for the long-term consideration, SDCWA can implement the options expressed in alternatives 7, 8 and 9, either in combination or singularly.

C35-32

Return to Contents

C35-93 An alternative not considered, but which need review is the combination of the Proposed Project and fallowing as described in Approach 2 of the HCP (Salton Sea Portion) and in Alternative 4. In the following, I have taken the liberty of providing the Appendix D criteria evaluation written statement.

C35-94 **Discussion of Alternative 11: Fallowing and Proposed Project - 300 KAFY Fallowing and 300 KAFY Water Conservation and Transfer**

The Proposed Project potion of this alternative includes the implementation of the water conservation and transfer project described in the IID/SDCWA Transfer Agreement. If the QSA is finalized and implemented, the Proposed Project would also include the modified IID/SDCWA transfer, and the additional water transfer to CVWD and/or MWD described in the QSA.

The IID/SDCWA Transfer Agreement is a long-term transaction between IID and SDCWA involving the conservation by IID of a primary amount between 130 KAFY and 200 KAFY, and the subsequent transfer of all or a portion of the conserved water to SDCWA. The IID/SDCWA Transfer Agreement also provides for the transfer of an additional "discretionary amount" of up to 100 KAFY. The conserved water would consist of Colorado River water that otherwise would be diverted by IID for use within IID's water service area in Imperial County, California. The water is intended for use within SDCWA's service area in San Diego County, California. Water would be diverted from the Lower Colorado River (LCR) at Parker Dam and conveyed via the Colorado River Aqueduct (CRA) to the SDCWA service area, pursuant to an exchange agreement between SDCWA and MWD. This diversion will result in no net change to the LCR flows below Parker Dam or to the CRA since MWD will be reducing its excess take from the Colorado River by the amount of the IID?SDCWA water transfer. Fallowing by individual landowners and farmers is not permitted under the terms of the IID/SDCWA Water Transfer Agreement for the conservation of the first 200 KAFY. As part of this alternative, the fallowing restriction must be revised.

Under the terms of the QSA, SDCWA would be limited to the primary amount of water (130-200 KAFY). An additional amount of 100 KAFY would be transferred to either CVWD or MWD. Fallowing is not prohibited by the QSA.

For the purposes of the environmental assessment of the Proposed Project portion of this alternative, it is assumed that water conservation would occur through the implementation of a broad range of conservation measures, which may vary from year to year, or even from season to season, depending on farmer participation, weather and other physical conditions, agricultural market conditions, and other variable factors. The conservation measures might include the following:

- On-farm irrigation system improvements, including on-farm irrigation management techniques
- Water delivery system improvements
- Water treatment and reuse measures
- Fallowing

Details of various conservation measures are included in Chapter 2 Project Description of the IID Water Conservation and Transfer EIR/EIS.

Water ;conservation within the IID water service area would result in a decrease in the amount of agricultural drainage reaching the Salton Sea, which would affect salinity levels and Salton Sea elevations. To mitigate these significant environmental impacts, land fallowing will be utilized as the second portion of this alternative to restore flows to the Salton Sea to pre-Project levels. It should be noted that the

DD-35

Return to Contents

Response to Comment C35-93

Comment noted.

Response to Comment C35-94

The alternative proposed by the commenter is evaluated in the Draft EIR/EIS as Alternative 4 with HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy). Regarding the commenter's suggestion to raise water prices to farmers within the IID water service area, it should be noted that IID's contract with the Bureau of Reclamation, as well as the California Irrigation Act, prohibits IID from charging more for water than the actual cost of service. In other words, IID cannot legally charge more for water to water users within their service area, than what it costs to operate and maintain their delivery system.

fallowing of this alternative is different in scope than the fallowing proposed in Alternative 4. In this case, the water conserved by fallowing will be diverted directly to the Salton Sea, rather than being transferred to SDCWA as in Alternative 4. Fallowing under this alternative will also completely eliminate the need to implement the HCP.

For purposes of analyzing the impacts of fallowing, it is assumed that lands will be taken out of production, after establishing a cover crop to retain soil and avoid windblown dust, and that the total amount of water historically delivered to the fallowed land will be treated as conserved water available for use in mitigating the negative environmental impacts of the Proposed Project. Given that 69% of applied water is consumptively used (crop ET and evaporation) and 31% is returned to the Salton Sea, fallowing land only provides a net savings of the 69% per acre. Assuming 6 AF per acre (actual number is 5.63 AF per acre - see Appendix E), to maintain the flows to the Salton Sea about 72,500 acres must be fallowed (300 KAFY divided by 69% times 6 AF/A). This is in addition to the 20,000 acres historically fallowed each year for land management/improvement farming practices. Because participation by landowners/farmers in the fallowing program would be voluntary, actual acreage might vary depending on the actual historical water usage of the land fallowed. Compensation to the landowners/farmers participating in the fallowing program will be required. Although it is not within the scope of the IID/SDCWA Water Conservation and Transfer Project Draft EIR/EIS to discuss economics of the alternatives, fallowing is an issue with significant on-going expenses, thus in the following paragraphs, I provide a simple analysis of the economics and my thoughts on how to fund payments for fallowing and conservation programs.

Historically, users within the IID service area have enjoyed low cost water. IID service are comprises 1,061,637 acres, of which 462,202 are irrigated with an average 5.6 AF/acre at an average cost of $15.50 per AF (Source: www.iid.com). Compare this to water rates in the SDCWA service area. SDCWA 2002 water rates to member agencies are $379/AF for agricultural use and $526/AF for M&I use. Onto these numbers, each member agency adds their district service costs. For the Fallbrook Public Utility District (North County, San Diego) rates are $423/AF agricultural and $577 to $642/AF M&I (Source: www.FPUD.com). Many of the member agencies being served by SDCWA charge even higher prices. Given these prices, farmers within the SDCWA service area have no choice but to implement conservation practices. The same cannot be said about farming within the IID service area. Because of the low water cost, no benefit is gained thru implementing conservation practices.

To fund compensation for the landowners/farmers participating in the fallowing program , to provide funds for the conservation programs of the Proposed Project, and to encourage on-farm water conservation, it will be necessary to increase the per AF water charges within the IID service area. A doubling of the per AF charge to $31/AF is proposed. Given that the Proposed Project will provide 2.5 MAFY billable water as measured at Mesa Lateral 5 (see Figure 3.1-26), doubling the water rate will provide an additional $38.75 million. When added to the $46.6 million ($233/AF times 200 KAFY) to be received from SDCWA as part of the water transfer and funds available swell to $85.4 million annually.

The question now is, are these funds sufficient to compensate landowners/farmers participating in fallowing and fund conservation projects/programs as described in the Proposed Project? A statement from IID provides a baseline.

> "In 2000 over 580,000 acres of Imperial Valley land within (IID) district boundaries was farmed to produce over $900 million in field, vegetable and permanent crops." (Source: www.IID.com)

There is an apparent discrepancy in IID's statements regarding farmed land - 462,202 irrigated land versus 580,000 farmed land. It is not the purpose here to resolve the difference- likely due to range land for cattle operations not being irrigated - but to enable the generation of a per acre gross return. Within the IID service area, gross return per acre thus ranges $1560 and $1948. Net of expenses, the landowner/farmer can expect to earn $200 to $800 per acre (my estimate - further research needed). With 72,500 acres fallowed this would lead to fallowing payments of $14.5 million to $58.0 million, thus leaving sufficient funds to implement the conservation programs of the Proposed Project.

C35-34

Proposed Project Screening Criteria

C1: Provide SDCWA with reliable source	**Pass**
C2: Protect IID's water rights	**Maybe**
C3: Reduce environmental impacts	**Pass**
C4: Technically feasible and reliable	**Pass**
C5: Institutionally and politically feasible	**Pass**
C6: Implementable within reasonable time period	**Pass**
C7: Meets QSA transfer objectives	**Pass**

EXPLANATION: This alternative is an expansion of the Proposed Project and meets the Proposed Project objectives. It is designed to provide SDCWA with an alternative and reliable water source, while preserving the Salton Sea at current state. It uses proven conservation technologies and does not appear to pose any insurmountable permitting issues and no large-scale construction prior to implementation is required. Also, the QSA transfer objectives are fully satisfied undr the Proposed Project portion of this alternative. Given these considerations, criteria C1, C4 , C6 and C7 are rated PASS.

Criteria C2 is rated a MAYBE due to the concern that farmland fallowing and diversion of the conserved water to Salton Sea may not be considered a reasonable and beneficial use of IID's water rights. Also the IID/SDCWA Transfer Agreement prohibits use of fallowing as a conservation measure under IID's contracts with participating landowners. This restriction does not need to be changed since NO FALLOWING is being done for the first 200 KAFY of transfer water under the Proposed Project portion of this alternative. Given the political need to make this water conservation and transfer project work, which includes the mitigation of all serious environmental impacts, acceptance of contract modification, if required, can be assumed and since the water conserved by fallowing is being used to mitigate significant environmental impacts caused by the water transfer, its use to maintain the Salton Sea becomes a beneficial use.

The intent of the farmland fallowing portion of this alternative is to preserve the Salton Sea inflows at the No Project level. To the extent that this is achieved, most, if not all (analysis per Section 3 of this Draft EIR/EIS is required to determine), of the environmental impacts to the Salton Sea associated with the Proposed Project will be fully mitigated, and the need for the HCP under the Proposed Project portion of this alternative would essentially be eliminated. Criteria C3 is thus rated PASS.

The fallowing of lands to develop conserved water to maintain historic flows to the Salton Sea at historic levels will likely be a controversial issue within the Imperial Valley, and may be opposed by members of the community based on potential socio-economic impacts to third parties. The IID Board has adopted a policy that landowners participating in the conservation plan should not be compensated for fallowing as a means of conserving water for transfer and, as previously stated, the IID/SDCWA Transfer Agreement prohibits fallowing as a means of water conservation for the first 200 KAFY, although the QSA has no such fallowing restriction. Technically, the IID/SDCWA Transfer Agreement is not an issue since the first 200 KAFY of water transfer will be generated by conservation techniques per the Proposed Project portion of this alternative, thus fallowing is not prohibited under the fallowing portion of this alternative. Board policy regarding compensation for following is a political issue solely within the control of the IID Board and can easily be changed, especially if it is the ONLY WAY that the IID/SDCWA water transfer can be implemented.

C35-34

difficult to quantify the socio-economic costs associated with the health issues (wind-borne toxic dust), loss of real estate property values (Salton Sea shoreline communities will cease to exist, primarily because sea access will be five or more miles distant across IID property and recreational opportunities will be lost; and due to health concerns from the wind-borne dust and airborne aromas, which may be more prevalent, real estate values throughout Imperial/Coachella Valley will likely be negatively impacted), and loss of recreational opportunities and underlying support businesses without a full evaluation as per the Proposed Project. But it can be surmised that the socio-economic impacts of this alternative will be significantly less than those of the Proposed Project, with or without the HCP. Given the institutionally and politically feasibility of this alternative, Criteria C5 is thus rated PASS. .

CONCLUSION: All screening criteria of **Alternative 11** are PASS, with the exception of C2 which is a MAYBE. Because there are no fails, this alternative should be fully evaluated. It is my opinion that this alternative is the best options for implementing the IID/SDCWA water transfer and implementing the QSA. It also meets all the objectives of the 4.4 Plan. C35-94

ADDITIONAL ALTERNATIVES

Additional alternatives come to mind, some of which may have merit for analysis within the scope of this EIR/EIS. Being limited in time, I leave it to others to pursue the merits.

- Combine the fallowing concepts of Alternative 11 with the water transfer projects discussed in alternatives 1, 2 and 3. Each of these combinations would reduce the acreage needed in the fallowing program required to preserve Salton Sea historic surface elevation level.
- Pipe unused SD County Title 22 tertiary wastewater to Salton Sea. Per the SDCWA Urban Water Management Plan by the year 2020, San Diego County will be dumping to ocean outfall approximately 80 KAFY of "excess" Title 22 tertiary and 124 KAFY of secondary wastewater. Combined, if piped to Salton Sea, this would provide a replacement water source of 204 KAFY for the sea and thus stabilize the surface elevation.
- Scrap the IID/SDCWA water transfer and instead have IID do transfers with Arizona, Nevada and/or Mexico in exchange for Title 22 secondary and tertiary wastewater and financial considerations for use in water conservation projects and Salton Sea restoration. SDCWA will have to satisfy their needs per the options discussed in alternatives 7, 8 or 9, or a combination of them. C35-95
- Conserve water per the Project but use conserved water within Coachella/Imperial Valley to expand acres farmed - dairies, fish farms, crops. A portion of the conserved water should be dedicated to the Salton Sea Restoration Project. Preserves IID water rights and preserves the Salton Sea status quo. Again, SDCWA will have to satisfy their needs per the options discussed in alternatives 7, 8 or 9, or a combination of them.
- Conserve water per the Project but use conserved water to directly restore the Salton Sea under the auspices of the Salton Sea Restoration Project. With the proposed diking and evaporation ponds, the low TDS conserved water should accelerate the sea's restoration. Again, SDCWA will have to satisfy their needs per the options discussed in alternatives 7, 8 or 9, or a combination of them.

END OF **APPENDIX D** COMMENTS

Return to Contents

Response to Comment C35-95

The commenter suggested that several additional alternatives be further evaluated in the Draft EIR/EIS. The following paragraphs respond to each of the alternatives suggested.

- The Proposed Project intentionally incorporates sufficient flexibility to implement various conservation measures including on-farm irrigation improvements, system-based conservation measures, and fallowing to obtain water for transfer, HCP measures, and compliance with the IOP. The project description allows IID and the program participants to vary the type of conservation measure and the amount of water conserved through the various measures including fallowing. Additionally, HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy) allows the same flexibility; that is, water to assure that inflows to the Sea are not reduced compared to the Baseline can be generated through any type of conservation measure including fallowing. However, it is assumed that fallowing would be the most likely method for generating this water. Additionally, HCP Approach 2 (now referred to as Salton Sea Habitat Conservation Strategy) can be scaled to generate the amount of water required, depending on the amount of water transferred and the resulting effect on inflows to the Sea.

- The concept of pumping waste water from coastal areas as replenishment water for the Salton Sea was analyzed in detail in "Salton Sea Alternatives Pre-Appraisal Report" (Reclamation 1998). The report looked at pumping water from two sources: the Hyperion Waste Water Treatment Plant in Los Angeles, and the Point Loma WWTP in San Diego. The concepts were rejected because of cost (life-cycle cost present value of $2.5-$5.6 Billion), seismic concerns, and severe environmental degradation of critical habitat areas along any reasonable pipeline route. Additionally, please note that this is an alternative for restoration of the Sea, not a Project Alternative.

- The third proposal was unclear, and therefore we cannot respond. However, the potential for water transfers with other Basin states is addressed in response given for Comment C35-88.

Response to Comment C35-95 (continued)

- The commenter suggests that SDCWA should meet their water requirements via Alternative 7, Alternative Transfers; Alternative 8, Maximize Local Supplies in SDCWA Service Areas and Desalination; and/or Alternative 9, CVP and SWP Supplies. Each of these alternatives was eliminated because of either inability to meet project objectives or inability to reduce impacts compared to the Proposed Project. SDCWA may choose to pursue any or all of these options in the future; however, they are not considered to be viable alternatives to meet the objectives of this Project.

- Conserving water within the IID water service area for use by the Salton Sea Restoration Project is not a feasible alternative unless sufficient funds are allocated to the Salton Sea Restoration Project to pay farmers to construct conservation projects. Currently, sufficient funding has not been allocated to the Salton Sea Restoration Project. Please refer to the Master Response on *Other—Relationship Between the Proposed Project, QSA, IA, IOP, and CVWD Groundwater Management Plan* in Section 3 of this Final EIR/EIS.

CORRECTIONS

Not Part of Review Comments

Return to Contents

C7: Meets QSA transfer objectives	Fail

C35-96

EXPLANATION: Water transfers from other sources in California to SDCWA might supplement their existing supply; however, it is unlikely that they could provide SDCWA with a reliable source in the event of a drought period. – Therefore, (F) is rated Fail.

C1

This alternative may adversely impact IID's water rights because it would not serve IID's objective to develop an on-farm and system conservation program to increase irrigation efficiency, and it would not implement SWRCB directives, thereby allowing the potential for challenges to its water use. Therefore, this alternative fails C2. Without specific transfer terms, it is speculative to state whether this alternative could minimize environmental impacts when compared to the Proposed Project.

Additionally, due to conveyance capacity constraints, C4 is rated Unknown. This alternative would not meet the QSA transfer objectives.

CONCLUSION: Because this alternative does not meet the Proposed Project objectives to supply SDCWA with a reliable alternative water supply and protect IID's water rights, it has been eliminated from further consideration. Additionally, it is uncertain if this project could reduce environmental impacts when compared to the Proposed Project. However, it should be noted that SDCWA might pursue some transfers from these sources as a supplement to its overall supply.

Response to Comment C35-96

The suggested changes have been made and are reflected in Section 4.2, Text Revisions in this Final EIR/EIS.

- To diversify its sources of water supply and reduce its current dependence on a single source for imported water, in order to enhance the reliability of its water supply.
- To establish a stabilized, competitive price for a significant portion of its water supply.

Both the IID/SDCWA Transfer Agreement and the QSA incorporate crucial elements of California's draft Colorado River Water Use Plan (California Plan) (see Section 1.4.6), which provides a framework to assist California in reducing its use of Colorado River water to its apportionment of 4.4 million acre-feet (MAF) in a normal year, and to mitigate the impact on California water agencies and water users associated with the reduction in diversions from the Colorado River. The broad purpose of the QSA, in particular, is to facilitate key elements of the California Plan. The parties to the QSA, which are IID, CVWD, and MWD, have determined that the QSA fulfills the following collective objectives of its proponents:

- To settle, by consensual agreement, long-standing disputes regarding the quantity, priority, use, and transferability of Colorado River water.
- To agree on a plan for the future distribution of Colorado River water among IID, CVWD, and MWD for up to 75 years, based on Colorado River water budgets for IID, CVWD, and MWD.
- To facilitate agreements and actions which, when implemented, would enhance the certainty and reliability of Colorado River water supplies available to IID, CVWD, and MWD, and would assist these agencies in meeting their water demands within California's apportionment of Colorado River water.
- To identify agreed-on terms and conditions for the conservation and transfer of specific amounts of Colorado River water within California.
- To provide incentives to promote conservation of Colorado River water.

1.2.2 Habitat Conservation Plan Objectives

For IID, the objectives of the HCP are:

- To minimize and mitigate the impacts of any take of covered species that might occur as a result of the implementation of the IID/SDCWA Transfer Agreement, the IID water conservation and transfer projects provided for under the QSA, the consensual cap on Colorado River water diversions by IID, and continuation of IID's routine operation and maintenance (O&M) activities in connection with IID's water irrigation and drainage system.
- To provide regulatory assurances to IID that additional mitigation measures to address impacts on covered species would not be required beyond the measures described in the HCP.
- To support issuance of Incidental Take Permits under both the federal and the state Endangered Species Acts (ESA) for the covered activities.

C35-97

The components of the HCP are further described in Section 2.2.6 of Chapter 2 and in Appendix C.

Response to Comment C35-97

The suggested changes have been made and are reflected in Section 4.2, Text Revisions in this Final EIR/EIS.

TABLE 2-2
IID's Proposed Water Budget under the QSA

Water Budget (< > indicates water transfer to others)	Budget Cap and Adjustments	Additional Notes
3,100 KAF	Priority 3 Water Use Cap	
< 100 to 110 KAF >	To MWD per the 1988 IID/MWD Agreement	The 1988 IID/MWD Agreement is described in Section 1.4.4 in Chapter 1. Under this agreement, MWD is entitled to request and divert from the Colorado River an amount equal to the amount of water conserved by certain conservation projects paid for by MWD, estimated to range from 100 to 110 KAFY. Water began to be available under this agreement in 1990; the project reached full implementation in 1998. The impacts of the 1988 IID/MWD Agreement were addressed in a previous environmental assessment.
< 130 to 200 KAF >	To SDCWA – Transfer of conserved water	Transfer of conserved water to SDCWA is described in Section 2.2.4.1 in this Draft EIR/EIS.
< 56.2 KAF >	To MWD as part of the AAC Lining Project[1]	The AAC Lining Project is described in Section 1.5.2 in Chapter 1 and Section 5.3 in Chapter 5 in this Draft EIR/EIS.
< 11.5 KAF >	To San Luis Rey Indian Water Rights Settlement parties via MWD as part of the AAC Lining Project	The San Luis Rey Indian Water Rights Settlement Act, enacted by Congress in 1988 as amended in 2000 (Title I of Public Law 100- 675), authorized a settlement of water rights claims to San Luis Rey River water. This settlement is expected to be facilitated through the use of 11.5 KAFY of water conserved by the AAC lining project and 4.5 KAFY conserved by the Coachella Canal lining project. Environmental compliance is provided for in the Draft IA EIS, Coachella Canal Lining Project Final EIR/EIS, and the AAC Lining Project Final EIR/EIS. Use of the water by certain settlement parties (the La Jolla, Pala, Pauma, Rincon and San Pasqual Bands of Mission Indians) will require additional environmental analysis.
< 100 KAF >	To CVWD and/or MWD – Transfer of conserved water	Transfer of conserved water to CVWD and/or MWD is described in Section 2.2.4.2 in this Draft EIR/EIS.
< 11.5 KAF >	For Miscellaneous and Federal present perfected rights	The QSA provides for IID's forbearance of use of 11.5 KAFY of Colorado River water to satisfy, at DOI's request, certain miscellaneous and Indian present perfected rights (see Section 1.4.2 in Chapter 1 of this Draft EIR/EIS) to Colorado River water. The 11.5 KAFY covered by IID's forbearance described above could be charged against IID's Priority 3, 6, or 7 water rights, at IID's option. To the extent the 11.5 KAFY is provided from IID's Priority 3 water right, that amount is included in the diversions subject to IID's contractual limitation on its Priority 3 diversions of Colorado River water at 3.1 MAFY, as described above and in the QSA.
2,610 to 2,690 KAF	Net Annual IID Water Budget	

Source: Reclamation 2002
Notes:
[1] In surplus years (as defined in the Draft IA EIS), IID would have a right to use this water with certain restrictions.

C35-98

5.1.1.1

Response to Comment C35-98

The suggested changes have been made and are reflected in Section 4.2, Text Revisions in this Final EIR/EIS.